

MEMORANDUM ENDORSED



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/24/2023

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Eric Teszler
Assistant Corporation Counsel
Office: (212) 356-1652

VIA ECF

Hon. Gregory H. Woods
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

November 22, 2023

Re: *Z.P. v. N.Y.C. Dep't of Educ.*, 23-cv-7479 (GHW)

Dear Judge Woods:

I am an Assistant Corporation Counsel in the Office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs, and expenses for legal work performed on administrative proceedings, as well as for this action, pursuant to the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. § 1400, *et seq.*

I write to respectfully request a 45-day adjournment of the Initial Conference, currently scheduled for December 4, 2023 (*see* ECF No. 5), to January 18, 2023 or a date thereafter that is convenient to the Court. This is Defendant's first request for an adjournment of the Initial Conference. Plaintiff consents to this request. The requested extension is intended to provide Defendant time to complete its internal review process of Plaintiff's attorney billing records, engage with Plaintiff in settlement discussions, and for the parties to hopefully resolve this matter. This office has settled all but four of the many dozens of similar IDEA fees-only cases brought by plaintiffs represented by The Law Offices of Irina Roller, PLLC in recent years without the need to burden the court with any motion practice or conferences. The parties are optimistic that this matter will follow the same course.

Accordingly, Defendant respectfully requests that the Initial Conference currently scheduled for December 4, 2023 be adjourned to January 18, 2024, or a date thereafter that is convenient to the Court.

Thank you for considering this request.

Respectfully submitted,

cc: Irina Roller, Esq. (via ECF)

/s/ Eric Teszler

Eric Teszler, Esq.

Assistant Corporation Counsel

Application granted. The conference scheduled for December 4, 2023 is adjourned to January 24, 2024 at 4:00 p.m. The parties are directed to the Court's Individual Rules of Practice in Civil Cases, which are available on the Court's website. Rule 2 of the Court's Individual Rules contains the dial-in number for the conference and other relevant instructions. The parties are specifically directed to comply with Rule 2(C) of the Court's Individual Rules.

SO ORDERED.

Dated: November 24, 2023

GREGORY H. WOODS
United States District Judge